

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:08CR00697 ERW
)	
TODD SHEPARD and)	
EVERETTE SIMMONS,)	
)	
Defendants.)	

GOVERNMENT'S REVISED PROPOSED EXHIBIT LIST

COMES NOW the United States of America, by and through its attorneys, Michael W. Reap, Acting States Attorney for the Eastern District of Missouri, and Dean R. Hoag, Assistant United States Attorney for said District, and submits the following proposed exhibit list:

1. Bank of America check card, issued to Paul Edwards;
2. Copy of DWI arrest;
3. AA travel records;
4. One CD with a phone conversation;
5. Avis/Budget rental records;
6. Hertz rental records;
7. Towing receipt;
8. Quality Bail Bond records;
9. Traffic ticket to Ryan Harshman;
10. Enterprise leasing records;
11. Crown Plaza records;

- 12. Comfort Inn records;
- 12A. Shepard's records;
- 12B. Harshman's records;
- 13. Laura Douglas' immunity agreement;
- 14. Ryan Harshman's proffer, 7/10/09;
- 14A. Ryan Harshman's plea agreement;
- 14B. Ryan Harshman's proffer letter
- 15. Doubletree Hotel records;
- 16. Wyoming Ave. lease agreement;
- 17. Motel 6 records;
- 18. Sheraton hotel records;
- 19. A. Westin Hotel records-Edwards;
B. Westin Hotel records-Simmons;
- 20. Southwest Airlines records;
- 21. United Airlines records;
- 22. Photographs from 6015 Hancock;
- 22A. Photo of 6015 Hancock - outside;
- 22B. Photo of address at 6015 Hancock;
- 22C. Photo of front door of 6015 Hancock;
- 22D. Photo of evidence seized at 6015 Hancock;
- 22E. Photo of evidence seized at 6015 Hancock;
- 22F. Photo of money seized at 6015 Hancock;
- 22G. Photo of trash bag - basement of 6015 Hancock;
- 22H. Photo of kilo wrapper found in trash bag;
- 22I. Photo of Charter bill for Todd Shepard;
- 23. Bank of America cards;
- 24. Kilo wrapper;
- 25. Visa debit card;
- 26. Cut material;
- 27. Charter Communications mail at 6015 Hancock;
- 28. Rubberbands found at 6015 Hancock;

29. Search warrant and affidavit for 6015 Hancock, Berkeley, Missouri;
30. A. (2) Oct. 8, 1993, convictions in St. Louis County, Missouri, for Trafficking-1st Degree, a Class A felony;
B. (1) Oct. 8, 1993, conviction in St. Louis County, Missouri, for Possession of Controlled Substance, a Class C felony;
31. Letter seized by Ron Goldstein written by defendant Todd Shepard;
32. Cardinal Towing records;
33. Inmate Property form;
34. National Car Rental records;
35. Subscriber information for (314) 488-0351;
- 35A. Subscriber information for (314) 578-4774;
36. A. Edwards' proffer DEA-6, 7/29/09;
B. Interview, 11/3/08;
C. Edwards' interview, 11/6/08;
D. Nappier interview;
37. Police report on arrest of Monica Ashe;
38. Lab results of Monica Ashe's arrest;
39. Proffer interview of Monica Ashe;
40. Photo ID of Todd Shepard;
41. Photo ID of Ryan Harshman;
42. Photo ID of Everette Simmons;
43. Photo ID of Paul Edwards;
44. Photo ID of Laura Douglas;
45. Photo ID of Monica Ashe;
46. Photo ID of Melody Newsom;
47. Grand Jury testimony of Paul Edwards;

- 48. Interview of Joe Pander;
- 49. Interview of Laura Douglas;
- 50. Phone records - Inmate Solutions;
- 51. Photo of Joe Pander;
- 52. Copy of Traffic tickets on 11/4/08 on Todd Shepard;
- 53. Evidence receipt for Bank of America card;
- 54. Bank of America records-Edwards;
- 55. Bank of America records-Shepard;
- 56. Summary charts;
- 57. DEA 6 on Monica Ashe/Shepard stop;
- 58. Search warrant for phone (314) 578-4774.

The Government also reserves the right to submit additional exhibits should it become necessary.

Respectfully submitted,

MICHAEL W. REAP
Acting United States Attorney

s/ Dean R. Hoag
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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2009, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Kevin Curran
Asst. Federal Public Defender
(Attorney for defendant Shepard)

and

Lenny Kagan
Attorney at Law
(Attorney for defendant Simmons).

s/ Dean R. Hoag
DEAN R. HOAG, #6426
Assistant United States Attorney